

# EXHIBIT B

**From:** [Eli Mosley](#)  
**To:** [Jessica Phillips](#); [Michael Bloch](#); [hoppe.ecf@vawd.uscourts.gov](mailto:hoppe.ecf@vawd.uscourts.gov); [Yotam Barkai](#)  
**Subject:** Re: Sines v. Kessler Kline Discovery and Fine  
**Date:** Thursday, January 2, 2020 10:46:08 AM  
**Attachments:** [Kline 2nd Set of Interrogatories.pdf](#)

---

Hello,

Attached is my second set of interrogatories. This set was originally sent to the [Eli.f.Mosley@gmail.com](mailto:Eli.f.Mosley@gmail.com) account that I do not have access to, but was sent a new copy by the Plaintiffs on 12/30 (it was too late with the New Year holiday for any Notary shop to be open when I got it). I went this morning as early as possible to get my responses notarized, and rush mailed the originals via FedEx (tracking number 779369327053). As of now, I believe I have completed all the discovery obligations that was discussed at the previous hearing. However, if there is anything else that I need to complete I am willing and able to do so expediently.

Thank you,  
Elliott Kline

On Mon, Dec 30, 2019 at 5:19 PM Eli Mosley <[deplorabletruth@gmail.com](mailto:deplorabletruth@gmail.com)> wrote:

Hello,

I've sent out my discovery obligations as well as the court ordered fine today and attached the information below.

For the fine, I was sent the court order on Tuesday, but wasn't able to check email until Thursday when I asked the Plaintiffs for the information on who to make the money order out to. I received a reply today and immediately went to the bank and then sent out the money order for \$600 to Integrity for America as per the Plaintiffs instructions using the fastest available speed via mail. The tracking number for money order is USPS # 9505 5103 4261 9364 5927 57, and I have included a picture of the money order that was sent below.

For the discovery obligations, I got them updated, notarized, and sent today to both the courthouse and to the plaintiffs. The originals went to the court. The tracking number for my response to interrogatories and request for documents (as well as the document) is FedEx 779326660014 using overnight shipping. These are attached below as well.

Please let me know if there is anything else needed for me to fulfill my discovery obligations and fine as I believe I have completed all the court and Plaintiffs have asked to the best of my ability.

Lastly, I was wondering if I could get an update from the Plaintiffs on the status of the "Walmart phone" and my new active phone? I have received my old deactivated phone back, but it does not entirely work and my phone service will not let me change to the old phone. Can I perhaps get the tracking number and an update on what is going on with those two phones?

Please let me know if there are any questions or concerns.

Thank you,  
Elliott Kline

Elliott Kline  
117 Mesa Drive  
Sinking Spring, PA, 19608

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

Sines and Others  
Vs  
Kessler and Others

Defendant Elliott Kline hereby responds to the Second Set of Interrogatories propounded by plaintiffs.

In the responses below, Kline responds based upon the information that is currently known to myself. Kline reserves the right to produce or to rely on additional documents or facts subsequently recalled or discovered and to assert additional objections and privileges as necessary.

1. I do not recall the exact structure or details of Identity Evropa as it was a few years ago, and most people used pseudonyms. However, it was basically ran by Nathan Damigo at the time with myself, Patrick Casey and a few others acting as a sort of "inner circle/council". There were various positions like "interview coordinator" and things like that, but I don't recall other positions/titles or who had them.
2. The core values, beliefs and mission of Identity Evropa could be found on their website and writing by Nathan Damigo. It has been a long time and I do not recall exactly what they were, but he did write them down and have them on our website at some point.
3. To become a member of Identity Evropa, one needed to apply on the website and then answer a few questions. They were then scheduled for an interview via Skype and were interviewed by a select few specific people who determined if they could join or not. Their main prerequisite/requirements were White people who were able to be active members of the organization.
4. I do not recall everyone who was a member of Identity Evropa who helped with Unite the Right because it was very decentralized. However, Nathan Damigo helped plan things specifically for Identity Evropa. I mainly worked on networking and communication between the various groups attending. Erica (I am unsure her last name) mostly helped coordinate what the women were doing. I do not recall any more specific members who participated in the planning.

5. Other than myself and Nathan, I don't remember the names or alias of Identity Evropa members who attended Unite the Right. Most people used fake names and it was more than 2 years ago so I don't remember specifically who was there.
6. The primary means of communications was always Discord, but Nathan Damigo and myself did use phone to text/call each other from time to time.
7. Jason Kessler, Nathan Damigo, Richard Spencer, Michael Enoch spoke several times over text message and phone about the event between 1/2017 and 8/2017. I do not recall exactly when each of these conversations took place, but we spoke frequently leading up to the event about the broad details of Unite the Right.
8. The only expenses I personally had was travel expenses in gas to drive there which I paid cash for.
9. I have not been charged criminally for anything previously.
10. The only legal matter I have had has been dealing with this specific case (Sines v Kessler)
11. There were no advertisements/promotions for Unite the Right to my knowledge or memory.
12. I spoke with 2 different law enforcement agents related to Unite the Right. One was a male detective in Charlottesville before the rally and the other was a female UVA university cop before the torch rally. I do not remember either of their names, but someone else mostly spoke to the police about the rally.
13. Other than the police, I personally spoke to no other government officials about the event.
14. Other than the UVA female police officer I spoke with I did not speak with any school officials.

I, Elliott Kline, based on reasonable inquiry, that the foregoing answers are true and correct to the best of my knowledge, information and belief. I verify under penalty of perjury that the foregoing is true and correct.

Dated: 1/2/2020

  
Elliott Kline

Commonwealth of PA  
County of Berks

Signed and sworn to before

me on JANUARY 20, 2020

by ELLIOTT Kline



